

EXHIBIT A-1

1 Q. Did y'all ever move on to the yard area?

2 A. I couldn't tell you where we moved to.

3 Q. Now, you think the Gulfport Police
4 Department beat you, don't you?

5 A. Yeah.

6 Q. The Gulfport Police Department officers
7 on this day, you think they actually assaulted
8 you?

9 A. Uh-huh.

10 Q. Your words, they beat me?

11 A. Uh-huh.

12 MR. BUCHANAN:

13 You have to answer out loud.

14 THE WITNESS:

15 Yes, ma'am.

16 MS. BROOM:

17 Q. Okay. Now, how did they beat you?

18 A. By slamming me and attempting to tase
19 me.

20 Q. Okay. Now, how many officers slammed
21 you, and where did they slam you?

22 A. All I remember is the one that grabbed
23 me and the others coming.

24 Q. And is that when they took you to the
25 ground? Well, you keep saying they slammed me,

1 passenger side. It was a Gulfport officer that
2 was driving. I honestly can't remember where he
3 let off the Florida police officer. And we went
4 down to the police station on 15th Avenue, I
5 believe it is, in Gulfport, downtown Gulfport.

6 Q. The Gulfport police station?

7 A. Yes, ma'am. He did paperwork down
8 there. And I told him, you know, why are we here
9 and stuff. And he said, well, I've got to do the
10 paperwork and then we're going to go to the jail.
11 Okay. So we did that, and he took me to jail.

12 Q. All right. Before we get to the jail,
13 let's stop there a second, if you don't mind.

14 A. Okay.

15 Q. Now, the Gulfport Police Department, was
16 that still there after Katrina downtown? Do y'all
17 know? So you went downtown?

18 A. It was something down there that we went
19 into.

20 Q. Okay. I didn't remember that. Now,
21 were you bleeding at all before you entered the
22 Harrison County jail?

23 A. Yes.

24 Q. And from what side of your face were you
25 bleeding?

1 Q. But you saw blood on your body, so you
2 knew -- or you wanted medical treatment?

3 A. Yes, ma'am.

4 Q. Okay. And then what happened next?

5 A. They refused. They told me to stand
6 back against the wall. I stood back against the
7 wall. Wills, Officer Wills, Correction Officer
8 Wills said, well, we'll just get some peroxide or

9 some alcohol and pour it on your little wound. I
10 said, no, you will not do such a thing because
11 you're not going to pour a caustic substance in a
12 fresh wound and make the wound worse.

13 Q. Okay. If I can stop you there. So
14 Officer Wills did offer --

15 A. No.

16 Q. -- to give you some medical treatment?

17 A. That was a smart aleck response, in my
18 opinion.

19 Q. In your opinion. But he did offer to
20 pour some peroxide on your wound?

21 A. Which is rather stupid medically, I'm
22 saying.

23 MR. BUCHANAN:

24 Answer her question.

25 THE WITNESS:

1 Okay.

2 MR. BUCHANAN:

3 What happened next?

4 A. As I recall, Wills and I kind of went
5 back and forth.

6 MS. BROOM:

7 Q. Verbally?

8 A. Verbally.

9 Q. Okay. Where were you standing at that
10 moment?

11 A. Back against that wall.

12 Q. Was the Gulfport Police Department
13 officer still there?

14 A. I remember him coming in giving the
15 corrections officers the paperwork and leave.

16 Q. Okay. So you're back against the wall?

17 A. Yes, ma'am.

18 Q. And is it just you and Wills there?

19 A. No. There was several other correction
20 officers back behind the cage.

21 Q. Okay. And then what happened next? How
22 long did y'all have this verbal altercation, or
23 verbal argument rather?

24 A. Maybe five minutes. And --

25 Q. What was said during this argument; do

1 you know?

2 A. Kind of debating over him saying that he
3 was going to put alcohol and peroxide on the wound
4 and him continuing it, and I said, no, you're not.
5 And I told him -- what did I tell him? I told him
6 again that I wanted to see the nurse for
7 treatment. And I can't remember exactly which,
8 but there were curse words exchanged between --

9 Q. So you're admitting that you were using
10 profane language against Wills?

11 A. I admit that, and I admit that he was,
12 also. And he said, Motherfucker, just wait a
13 minute.

14 Okay. So whatever he was doing, got
15 through. They came around the side of booking,
16 and I remember Thompson grabbing me, along with --
17 I can remember Thompson and Wills. Those are the
18 two I can really remember -- I know there was
19 others there -- and slamming me to the ground and
20 slamming my eyebrow into the pavement. I swear to
21 God I remember that. And I remember Thompson
22 putting my head into a choke hold, Wills grabbing
23 my thumb, and I do remember passing out. I
24 remember coming to, and one of the corrections
25 officers said, put the cuffs on just as tight as

1 A. Become unconscious?

2 Q. Uh-huh. Or lose consciousness.

3 A. When Wills choked me.

4 Q. Was that immediately after you hit the
5 ground?

6 A. Within seconds.

7 Q. Okay. Now, you would agree with me that
8 you came off the wall with your hands up without

9 permission?

10 A. Uh-huh.

11 MR. BRENDL:

12 Answer out loud.

13 THE WITNESS:

14 Yes, yes, yes, yes, yes.

15 MS. BROOM:

16 Q. You would agree that you disobeyed the
17 officers, too, correct? They told you to stand
18 against the wall, didn't they?

19 A. Yes.

20 Q. And they were coming towards you, saw
21 you off the wall and took you down, correct?

22 A. Slammed me down.

23 Q. They took you down to the ground,
24 correct?

25 A. That's a way of putting it, correct.

1 A. I can't recall.

2 Q. All right. Now, your thumb, you allege
3 that the officer pulled your thumb, correct?

4 A. Yes, ma'am. Wills.

5 Q. Wills. Now, you also name Teel as a
6 defendant in this. Why did you name Teel?

7 A. I don't remember Teel being there.

8 Q. Okay. Did you just use his name because
9 he was involved in the Jessie Lee Williams
10 incident --

11 A. No.

12 Q. -- or why did you pick his name?

13 A. I don't remember alleging Teel.

14 Q. Okay. But your thumb, they x-rayed it,
15 and you didn't have any fractures, correct?

16 A. Correct.

17 Q. It was just a sprained thumb?

18 A. Yes, ma'am.

19 Q. And the left cheek was just a
20 superficial wound. Now, with a superficial wound,
21 can you typically bleed from a superficial wound?

22 A. Certainly, yes, ma'am.

23 Q. Does it normally profusely bleed?

24 A. Well, it depends on the area. Facial
25 due tend to bleed more.

1 MR. BUCHANAN:

2 Well, if you can, you can. If you
3 can't, you can't.

4 MS. BROOM:

5 Q. I'm referencing the first page when the
6 nurse saw you. Isn't it true that the nurse saw
7 you at 12:20 on 9/5/05?

8 MR. BUCHANAN:

9 Now, are you asking if that's true or if
10 that's what's on the report?

11 MS. BROOM:

12 Q. Is that true?

13 MR. BUCHANAN:

14 Do you know?

15 A. I know a nurse, after my beating, did
16 come to booking, did dress it, did tell the cops,
17 correction officers he needs to go out, which is
18 their lingo for needs to go to Memorial, he needs
19 stitches. They said, no transports available. So
20 they refused me medical care, absolutely refused
21 me proper medical care.

22 MS. BROOM:

23 Q. Okay. And are you aware of whether the
24 facility was having problems contacting Memorial
25 Hospital due to it being five days after the

1 argument's sake, we'll assume your 15 hours. From
2 the time -- did anything change, did your
3 condition get worse within those 15 hours?

4 A. Yes.

5 Q. Okay. How was that?

6 A. Granulation starts in a wound, and it
7 can embed bacteria and it -- it's not apt to
8 suture as well.

9 Q. Okay. And did that occur in your
10 situation?

11 A. Yes, it did. As Dr. Dominguez put in
12 here, I'm sure, that he had to debride the wound;
13 in other words, he numbs it and scrubs it to make
14 it a fresh wound.

15 Q. Right. But it did eventually -- he did
16 suture it and it did heal, correct?

17 A. Uh-huh.

18 Q. And you didn't develop any infection
19 or --

20 A. No infection, but permanent nerve
21 damage.

22 Q. Okay. Are you alleging that because of
23 the alleged delay or --

24 A. No.

25 Q. Okay. Now, when you returned from